

Exhibit 1

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA**

JONATHAN R., *et al.*,

Plaintiffs,

v.

JIM JUSTICE, *et al.*,

Defendants.

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Case No. 3:19-cv-00710

DECLARATION OF JULIA SIEGENBERG

1. My name is Julia Siegenberg. I am a Senior Associate at Brown & Peisch, PLLC and have been outside counsel on the above-captioned case since February 10, 2020.

2. I am familiar with the steps taken by Defendants and third-party providers to produce documents responsive to Plaintiffs' Ninth Request, Nos. 24 and 37 (hereafter "RFP Nos. 9.24 and 9.37"), to comply with the Court's Order dated December 13, 2023, ECF No. 411.

3. Responding to these requests requires collecting documents from dozens of third parties who maintain records based on individual practice and preference. For example, RFP No. 9.37 requires collecting information from 27 different third-party providers operating 63 different residential treatment programs.

4. Responding to these requests requires Defendants and third parties to search for and collect a significant volume of information going back several years. For example, RFP No. 9.24 requires collecting information related to at least 555 reviews coordinated by third party Regional Clinical Coordinators since July 2019.

5. Based on my own personal experience, conversations with my colleagues at Brown & Peisch PLLC, and my conversations with DHHR staff, I estimate that Defendants and their

contractors (including counsel) have already spent dozens of hours searching for, collecting and producing responsive documents to Plaintiffs' requests.

6. Despite the best effort of Defendants and Defendants' counsel, Defendants will not be able to meet the January 3, 2024 deadline to comply with the Court's Order given the significant volume of information that must be collected, competing duties and obligations of third-party providers and the Regional Clinical Coordinators, and staffing limitations to accommodate for holidays at the end of calendar year 2023.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Julia Siegenberg

/s/ Julia Siegenberg

Date: January 2, 2024